

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the Application of:

Kenneth M Lassenen

Serial No.: 09/309,372

Filed: May 11, 1999

For: Client side localizations on the World
Wide Web

Atty. Docket No.: 003797.77742

Group Art Unit: 2176

Examiner: Nguyen, Maikhanh

Confirmation No.: 7410

REPLY BRIEF TO EXAMINER'S ANSWER

Mail Stop: Appeal Brief-Patents

Commissioner of Patents

P.O. Box 1450

Alexandria, VA 22313-1450

This is a Reply Brief in response to the Examiner's Answer dated April 17, 2008, and in support of applicant's August 20, 2007, Notice of Appeal. Appeal is taken from the final office action mailed February 21, 2007, and the advisory action mailed May 7, 2007. Please charge any necessary fees in connection with this appeal brief to our deposit account no. 19-0733.

On page 11, the Examiner's Answer, which was mailed April 17, 2008, asserts that Applicant is arguing against the references individually. Applicant disagrees. The second full paragraph on page 7 of the Substitute Brief on Appeal, states that "Flanagan and Kennelly, either alone or in combination with the other prior art of record, fail to establish prima facie obviousness of the invention of claim 1." The first paragraph on page 10 of the Substitute Brief on Appeal makes an analogous statement with respect to these references and claim 6. As such, Applicant has not argued against the references individually.

On page 12, the Examiner's Answer asserts that "the examiner mapped each claimed limitation to specific element(s) and/or relevant passages in the Flanagan and Kennelly references to show how the references meet the claims. Applicant in response did not provide

any underlying analysis as to why the portions of the prior art relied on did not support the examiner's position." Applicant disagrees. The first full paragraph on page 7 of the Substitute Brief on Appeal, states that modifying Flanagan with Kennelly as proposed by the examiner "would not result in the invention of claim 1. Instead, such a combination would result in downloading an HTML document with content expressed in English and then using machine-translation software, which accesses multiple language-specific files stored in multiple language-specific subdirectories, to translate the text into a user's native language." The second full paragraph on page 9 of the Substitute Brief on Appeal makes an analogous statement with respect to the combination of these references proposed by the examiner and claim 6.

Further, on pages 12-13 of the Examiner's Answer, the language names, such as English and Japanese, in the drop down menu box 218 of page 208 in Figure 7 are cited as the first plurality of phrases. Page 13, of the Examiner's Answer, then states that Kennelly teaches "selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user." But Kennelly does not teach or suggest selecting the second plurality of phrases from the first plurality of phrases. Instead, Kennelly discloses using machine-translation software, which accesses multiple language-specific files stored in multiple language-specific subdirectories, to translate the text into a user's native language. In this regard, page 13 of the Examiner's Answer states that, "if the user selects a language other than the default language ... management object request processor ... call[s] the corresponding language data file ... from the corresponding subdirectories."

As such, Flanagan and Kennelly, either alone or in combination do not disclose, teach, or suggest "receiving the electronic file at the user's computer, wherein the electronic file's content

includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed ... and at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user," as is recited in claim 1.

Similarly, Flanagan and Kennelly, either alone or in combination do not disclose, teach, or suggest performing the following steps at a receiving computer: (1) using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, (2) receiving the electronic file from a sending computer, and (3) inserting the translation obtained from the electronic file into a translated electronic file, as is recited in claim 6.

For at least the foregoing reasons and those set forth in the Brief on Appeal, applicant respectfully submits that the final rejection of claims 1-13 is improper and should be reversed.

Respectfully submitted,
BANNER & WITCOFF, LTD.

Dated: June 17, 2008

By: /William J. Klein/
William J. Klein
Registration No. 43,719

10 S. Wacker Drive, Suite 3000
Chicago, IL 60606
(312) 463-5000